

FEDERAL ELECTION COMMISSION  
MUR # 6916

FOUNDATION FOR ACCOUNTABILITY AND CIVIC TRUST

Complainant,

vs.

CATALIST, LLC, et al.

Respondents.

**RESPONSE TO COMPLAINT**

Now comes Respondent, Fred Kundrata for Congress Committee, in response to a Complaint (MUR # 6916) filed against it and hereby states as follows:

Initially, it appears that no specific allegation against the Fred Kundrata for Congress Committee has been made by Complainant. Rather, Complainant has included each and every Democratic candidate's committee in its complaint, without any information and belief as to utilization or participation in the alleged actions of which it complains. The complaint alleges three (3) separate impermissible or illegal acts, only one of which is alleged to have been undertaken by individual campaign committees, such as Respondent, Fred Kundrata for Congress Committee. Said allegation states that:

"Catalist appears to have made and the Democratic political party committees and federal campaign committees appear to have received impermissible, excessive, and unreported contributions in the form of in-kind data services from Catalist, a governmental contractor."

Respondent, Fred Kundrata for Congress Committee, did not receive any data services from Catalist. Therefore the Complaint as alleged against the Fred Kundrata for

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Congress Committee has no basis in appearance or fact, and is made frivolously and recklessly. As such, we respectfully request the complaint as against the Fred Kandrata for Congress Committee be adjudged to not warrant the use of Commission resources and be dismissed as to the Fred Kandrata for Congress Committee.

Respectfully submitted,

/s/ William M. Bristol

William M. Bristol

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